- (2) Each malfunction and repair of the surveillance system as defined in this section; and
- (3) Activities performed by surveillance agents as required by the controls in this section.

[77 FR 58712, Sept. 21, 2012, as amended at 78 FR 63875, Oct. 25, 2013]

## §543.22 [Reserved]

## § 543.23 What are the minimum internal control standards for audit and accounting?

- (a) Conflicts of standards. When establishing SICS, the gaming operation should review, and consider incorporating, other external standards such as GAAP, GAAS, and standards promulgated by GASB and FASB. In the event of a conflict between the MICS and the incorporated external standards, the external standards prevail.
- (b) Accounting. Controls must be established and procedures implemented to safeguard assets and ensure each gaming operation:
- (1) Prepares accurate, complete, legible, and permanent records of all transactions pertaining to gaming revenue and activities for operational accountability.
- (2) Prepares general accounting records on a double-entry system of accounting, maintaining detailed, supporting, subsidiary records, and performs the following activities:
- (i) Record gaming activity transactions in an accounting system to identify and track all revenues, expenses, assets, liabilities, and equity;
- (ii) Record all markers, IOU's, returned checks, held checks, or other similar credit instruments;
- (iii) Record journal entries prepared by the gaming operation and by any independent accountants used;
- (iv) Prepare income statements and balance sheets;
- (v) Prepare appropriate subsidiary ledgers to support the balance sheet;
- (vi) Prepare, review, and maintain accurate financial statements;
- (vii) Prepare transactions in accordance with the appropriate authorization, as provided by management;
- (viii) Record transactions to facilitate proper recording of gaming rev-

- enue and fees, and to maintain accountability of assets;
- (ix) Compare recorded accountability for assets to actual assets at periodic intervals, and take appropriate action with respect to any variances;
- (x) Segregate functions, duties, and responsibilities;
- (xi) Prepare minimum bankroll calculations; and
- (xii) Maintain and preserve all financial records and relevant supporting documentation.
- (c) Internal audit. Controls must be established and procedures implemented to ensure that:
- (1) Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with TICS, SICS, and these MICS, which include at least the following areas:
- (i) Bingo, including supervision, bingo cards, bingo card sales, draw, prize payout; cash and equivalent controls, technologic aids to the play of bingo, operations, vouchers, and revenue audit procedures;
- (ii) Pull tabs, including, supervision, pull tab inventory, pull tab sales, winning pull tabs, pull tab operating funds, statistical records, and revenue audit procedures;
- (iii) Card games, including supervision, exchange or transfers, playing cards, shill funds, reconciliation of card room bank, posted rules, and promotional progressive pots and pools;
- (iv) Gaming promotions and player tracking procedures, including supervision, gaming promotion rules and player tracking systems;
- (v) Complimentary services or items, including procedures for issuing, authorizing, redeeming, and reporting complimentary service items;
- (vi) Patron deposit accounts and cashless systems procedures, including supervision, patron deposit accounts and cashless systems, as well as patron deposits, withdrawals and adjustments:
- (vii) Lines of credit procedures, including establishment of lines of credit policy;
- (viii) Drop and count standards, including supervision, count room access, count team, card game drop standards, player interface and financial instrument drop standards, card game count